

To: Carlin, Jayne[Carlin.Jayne@epa.gov]; Henning, Alan[Henning.Alan@epa.gov]
From: Wu, Jennifer
Sent: Tue 12/23/2014 5:36:45 PM
Subject: FW: pesticides
Pesticides rationale 121914_ac.docx

From: Allison Castellan - NOAA Federal [mailto:allison.castellan@noaa.gov]
Sent: Friday, December 19, 2014 1:45 PM
To: Wu, Jennifer
Subject: pesticides

Hi Jenny--

first, huge gratitude to you to volunteering to lead the pesticides section and I really appreciate all of your amazing work on this and coordinating input from so many people on this topic--it's not easy and you've done a great job balancing a lot of divergent opinions. I think we're getting there.

Here's my comments/revisions on the latest version of the pesticides rationale. I noticed that good handful of comments raised concerns that we hadn't clearly shown a reason for pesticide add MM. I've suggested some revisions to the first half to hopefully make that more explicit by specifically point to 6217(b)(1)(B) and mirroring the "reasonable foreseeable" threat language in the statute. Unlike riparian where we have known wqs impairments, we're taking the precautionary approach for pesticides that aligns with 6217(b)(1)(B) of the statute.

I'll give you a call in a sec to try to reach you before I leave today. Otherwise, I'll be in Dec. 29-31. You'll notice that there are a few comments that I highlighted yellow. Those were reminders to me to go back and look up the info myself to insert so you wouldn't have to, but alas, I ran out of time. If you don't get to that, I'm happy to do that when I'm back...just let me know what you got to and what you didn't.

Have a happy (and hopefully restful) holiday!

Allison

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